

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA**

LIKESHA HILL-HANNAH

Plaintiff,

vs.

ESO MANAGEMENT, LLC and
ORTHO SPORT & SPINE
PHYSICIANS, LLC and AVO REAL
ESTATE HOLDINGS, LLC

Defendants.

CIVIL ACTION FILE
NO.: _____

CONSENT MOTION TO PROVISIONALLY SEAL

COME NOW, Plaintiff Likesha Hill-Hannah (“Plaintiff”) and Defendants ESO Management, LLC (“ESO Management”), Ortho Sport & Spine Physicians, LLC (“OSSP”), and AVO Real Estate Holdings, LLC (collectively “Parties”), by and through undersigned counsel, and hereby file this Consent Motion to Seal, as follows:

The Parties respectfully request this matter be provisionally sealed to protect information that Defendant ESO Management has designated as confidential.

Defendants will file a more formal brief outlining the basis for their request, as well as corresponding case law, simultaneously with Defendants’ Answer and/or responsive pleading.

The Plaintiff does not oppose Defendants' opportunity to fully brief its reasoning for its request to seal the filings in matter.

In the interim, the parties jointly request that the Court provisionally seal the underlying matter until Defendants make their formal request and showing to the Court.

CONCLUSION

For the reasons set forth above, the Parties respectfully request this Court GRANT this Consent Motion to Provisionally Seal.

Respectfully submitted, the 16th day of February 2023.

By: /s/ Yasha Heidari

YASHA HEIDARI

Georgia Bar No.: 110325

EVAN SMITH

Georgia Bar No.: 514676

**HEIDARI POWER LAW
GROUP, LLC**

2997 Cobb Parkway #724615

Atlanta, Georgia 31139

Tel.: 404-939-2742

Fax: 404-601-7852

By: /s/ Arnold Lizana

ARNOLD J LIZANA

Georgia Bar No.: 698758

**LAW OFFICES OF ARNOLD J.
LIZANA, III**

1175 Peachtree Street NE, 10th Floor

Atlanta, Georgia 30361

Tel.: 404-207-1559

Fax: 470-231-0672

CERTIFICATE OF COMPLIANCE

The undersigned hereby certifies that the foregoing pleading complies with the font and point selections approved by the Court in Local Rule 5.1C. This document has been prepared in Times New Roman font, 14 point.

/s/ Arnold Lizana

CERTIFICATE OF SERVICE

I hereby certify that on this day a copy of the within and foregoing ***CONSENT MOTION TO SEAL*** was served electronically by operation of the Court's electronic filing system [Pacer] upon all counsels of record, to wit:

Arnold J. Lizana
LAW OFFICES OF ARNOLD J. LIZANA, III
1175 Peachtree Street NE, 10th Floor
Atlanta, Georgia 30361

Attorney for Plaintiff

Yasha Heidari
Evan Smith
HEIDARI POWER LAW GROUP, LLC
2997 Cobb Parkway # 724615
Atlanta, Georgia 31139

Attorneys for Defendants

This 16th day of February 2023.

By: /s/ Arnold Lizana